

# EXHIBIT 7



Katherine Millet <kmillet@fordobrien.com>

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## Fwd: McNeil matter - Motion For Protective Order - 2 issues

1 message

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**Anjula Prasad** <aprasad@fordobrien.com>  
To: Katherine Millet <kmillet@fordobrien.com>

Wed, Sep 22, 2021 at 1:17 PM

Anjula S. Prasad  
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575 5th Avenue, 17th Fl.  
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[aprasad@fordobrien.com](mailto:aprasad@fordobrien.com)  
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Begin forwarded message:

**From:** "Kevin F. O'Shea" <[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)>  
**Subject:** RE: McNeil matter - Motion For Protective Order - 2 issues  
**Date:** August 25, 2021 at 10:35:49 AM EDT  
**To:** Robert Landy <[rlandy@fordobrien.com](mailto:rlandy@fordobrien.com)>  
**Cc:** Doug Graff <[doug@grafflaw.com](mailto:doug@grafflaw.com)>, Anjula Prasad <[aprasad@fordobrien.com](mailto:aprasad@fordobrien.com)>

Rob, following up on my recent email, the names of those on the Incident Command Team are below, in alphabetical order.

Michelle Burnett  
Dina Bush  
Ben Carter  
Magi Curtis  
Sr. Mary Ann Dillon  
Tammy Erwin  
Bret Gallaway  
Rick Gilfillan, M.D.  
Ruth Goodell  
Sofia Guadiso  
Dan Hackett  
Ed Hodge  
Michael Holper  
Samantha Irons  
Sally Jeffcoat  
Brett Justice  
Cindy Kalis  
Jason Korna  
Mary LaFrancois  
Ed Lamb  
Melissa Lander  
Gay Landstrom  
John Lawson  
Kaleigh Lemaster  
Jim Letourneau  
Tammy Lundstrom, M.D.  
Chuck Marsh  
Tauana McDonald

Mandi Murray  
Sean McKibben  
Greg Peterson  
Alicia Rausch  
Holly Reardon  
Linda Ross  
Daniel Roth, M.D.  
Maria Seyrig  
Mike Slubowski  
Risk Streck, M.D.  
Larry Swanner  
Katrina Trimble  
Mark Weaver  
Janet Whittey

**Kevin F. O'Shea**  
**The Miller Law Firm, P.C.**  
950 West University Drive  
Suite 300  
Rochester, Michigan 48307  
248-841-2200  
[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)

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**From:** Robert Landy <[rlandy@fordobrien.com](mailto:rlandy@fordobrien.com)>  
**Sent:** Tuesday, August 24, 2021 10:34 AM  
**To:** Kevin F. O'Shea <[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)>  
**Cc:** Doug Graff <[doug@grafflaw.com](mailto:doug@grafflaw.com)>; Anjula Prasad <[aprasad@fordobrien.com](mailto:aprasad@fordobrien.com)>  
**Subject:** Re: McNeil matter - Motion For Protective Order - 2 issues

Of course.

At some point in the next week we can send Judge Jolson a letter to so-order revising the schedule.

Robert S. Landy  
Partner  
**Ford O'Brien LLP**  
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17th Floor  
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On Tue, Aug 24, 2021 at 9:30 AM Kevin F. O'Shea <[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)> wrote:

| Yes, no problem as long as our Reply date is extended accordingly.

**Kevin F. O'Shea**  
**The Miller Law Firm, P.C.**  
950 West University Drive  
Suite 300  
Rochester, Michigan 48307  
248-841-2200  
[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)

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**From:** Robert Landy <[rlandy@fordobrien.com](mailto:rlandy@fordobrien.com)>  
**Sent:** Tuesday, August 24, 2021 9:27 AM  
**To:** Kevin F. O'Shea <[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)>  
**Cc:** Doug Graff <[doug@graflaw.com](mailto:doug@graflaw.com)>; Anjula Prasad <[aprasad@fordobrien.com](mailto:aprasad@fordobrien.com)>  
**Subject:** Re: McNeil matter - Motion For Protective Order - 2 issues

Thanks Kevin.

When we set the schedule I assumed August would be sleepy and I would have two largely-uninterrupted weeks to respond. Alas, in another matter I received a TRO last night with a hearing set for Friday afternoon.

The best laid schemes o' mice an' men gang aft agley.

Would you be willing to extend the schedule for that we have three weeks instead of to (such that our response would be due the Friday after Labor Day - 9/10)?

Thanks again,

Rob

Robert S. Landy  
Partner  
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\*\*\*\*\*

On Mon, Aug 23, 2021 at 3:29 PM Kevin F. O'Shea <[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)> wrote:

Rob, we'll provide you with control numbers for those documents as well as the names of those on the Incident Command Team. I'm confirming those names now before passing along to you.

**Kevin F. O'Shea**

**The Miller Law Firm, P.C.**  
950 West University Drive  
Suite 300  
Rochester, Michigan 48307  
248-841-2200  
[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)

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**From:** Robert Landy <[rlandy@fordobrien.com](mailto:rlandy@fordobrien.com)>  
**Sent:** Monday, August 23, 2021 11:11 AM  
**To:** Kevin F. O'Shea <[kfo@millerlawpc.com](mailto:kfo@millerlawpc.com)>  
**Cc:** Anjula Prasad <[aprasad@fordobrien.com](mailto:aprasad@fordobrien.com)>; Doug Graff <[doug@grafflaw.com](mailto:doug@grafflaw.com)>; Daniel L. Ravitz <[DLR@millerlawpc.com](mailto:DLR@millerlawpc.com)>  
**Subject:** McNeil matter - Motion For Protective Order - 2 issues

Kevin,

Can you provide us a list of the documents (based on control number) that you will submit to the Court in camera in connection with the motion, or is it all documents on the log?

Also, I have reviewed the motion papers including the brief and affidavits. One issue is that your argument takes the position that communication strategies were prepared under the supervision of the "Incident Command Team". The papers inform us that 3 lawyers were on the team as well as the CEO and "clinical staff" among others. But we don't know who is on the Incident Command Team.

As you know, most communications on your log that went to any of Ms. Murray; Ms. Ross or Mr. Hackett (the 3 in-house lawyers) aslo went to many others -- in many instances, dozens of others. Are you willing to disclose who was on the full team?

Best,

Rob

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